



Housing - State of the Nation Inquiry

Submission to the Public Accounts Committee

February 2017

About the Chartered Institute of Environmental Health (CIEH):

CIEH is the professional voice for environmental health representing over 9,000 members working in the public, private and non-profit sectors. It ensures the highest standards of professional competence in its members, in the belief that through environmental health action people's health can be improved.

Environmental health has an important and unique contribution to make to improving public health and reducing health inequalities. CIEH campaigns to ensure that government policy addresses the needs of communities and business in achieving and maintaining improvements to health and health protection.

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Key points

- Recognising the links between housing and health and improving poor quality accommodation has the potential to reduce the costs of ill health to the NHS as a result of poor housing
- The rise of the private rented sector is associated with a rise in poor housing conditions, with the sector as a whole having the highest proportion of non-decent homes compared to owner-occupied and social housing sectors
- The nation's stock of affordable housing, including social housing, should be increased as a vital response to growing homelessness and escalating demand for housing
- The minimum level of protection and conditions for tenants should be reviewed by Government, in recognition of the rising number of families who are living in rented accommodation long term
- CIEH would like to see a review of the Housing Health and Safety Rating System (HHSRS) Operating Guidance and Enforcement Guidance by the DCLG to ensure that housing standards can be improved, especially in privately rented accommodation

Homes and Health

Good quality, affordable, safe housing underpins our mental and physical well-being. In 2015, the cost of poor housing to the NHS has been estimated to be £1.4bn per annum by the Building Research Establishment (BRE).¹ There is a relationship between Excess Winter Deaths, low thermal efficiency of housing and low indoor temperature for people of all ages. In 2013, the number of households in fuel poverty in England was estimated at 2.35 million, representing approximately 10.4 per cent of all English households.² Children living in damp and mouldy homes are particularly at risk; they are almost three times as likely to suffer from coughing, wheezing and respiratory illness.³ Existing evidence also highlights that infants living in cold conditions have a 30% greater risk of admission to hospital or primary care facilities.⁴

Mental health issues can be exacerbated as a result of financial pressures associated with increasingly unaffordable housing costs. Affordability of housing is a growing concern for many families around the country. For example, in Thurrock, Essex, it is estimated that 45% of households are unable to afford current market rent levels.⁵ Mental health is also negatively affected by fuel poverty and cold housing for any age group, with more than 1 in 4 adolescents living in cold housing being at risk of multiple mental health problems compared to 1 in 20 adolescents who have always lived in warm housing.⁶

Housing shortage

The shortage of housing is being felt across all parts of the country and levels of homelessness appear to be rising. Between 2010 and 2016, the number of people in

¹ <http://www.bre.co.uk/filelibrary/pdf/87741-Cost-of-Poor-Housing-Briefing-Paper-v3.pdf>

² [Annual Fuel Poverty Statistics Report](#), DECC, 2015.

³ Marmot Review Team (2011) *The Health Impacts of Cold Homes and Fuel Poverty*. Friends of the Earth and the Marmot Review Team, London.

⁴ Child Health Impact Working Group (2006) *Unhealthy Consequences: Energy Costs and Child Health*. Boston, MA: CHIWG.

⁵ See case study on Thurrock.

⁶ Marmot Review Team (2011) *The Health Impacts of Cold Homes and Fuel Poverty*. Friends of the Earth and the Marmot Review Team, London.

temporary accommodation in England has risen from 49,700 to 74,600.⁷ One CIEH member told us: *"here in Corby the demand for housing is at its highest than it has ever been."* The shortage of housing and rising market rents are also contributing to intentional overcrowding. It has been estimated that 675,000 households are currently living in overcrowded conditions in England.⁸

The shortage of housing in England has been acknowledged in the recently-published Housing White Paper "Fixing our broken housing market", however building enough homes to meet rising demand will take some time. Whilst CIEH supports the ambition to build more high quality housing, we would like to see further initiatives to improve the quality of the existing housing stock and to raise the minimum standards in older homes.

Growth of the Private Rented Sector

The private rented sector (PRS) is expanding rapidly at a time when Local Authorities are under significant pressure, due to recent cuts to local budgets. Over the last 10 years, the proportion of households in the private rented sector with dependent children increased from 30 per cent in 2004-05 to 37 per cent in 2014-15. This increase equates to about 912,000 more households with children in the private rented sector.⁹ It is therefore vital that the conditions of the PRS are suitable for this type of tenancy, providing both a level of stability and security in tenancies as well as suitable quality accommodation to support good health in children.

The English Housing Survey Headline Report shows that in 2014-15, a fifth of dwellings – or 4.6 million homes - failed to meet the Decent Homes standard. The private rented sector had the highest proportion of non-decent homes (29 per cent) while the social rented sector had the lowest (14 per cent). Among owner occupied homes, 19 per cent failed to meet the Decent Homes standard.¹⁰

Environmental Health Officers (EHOs) and Housing Managers working for Local Authorities respond to complaints and queries from the public when there is a dispute between the tenant and the landlord over housing conditions in privately rented accommodation. We have asked our members to submit their experiences of the changes to the PRS in recent years and to tell us about their observations on the trends accompanying the increase in the number of families renting their homes.

One of our members said: *"due to lack of social housing, families are increasingly spending years in the private rented sector. It is completely unsuitable for families as there is no security of tenure, no rent control and the management and maintenance by mostly amateur landlords can be poor."* Another Environmental Health Officer highlighted that *"Staff enforcing housing standards are inundated with work and are struggling to keep up with incoming complaints, never mind trying to be proactive."* The combination of the increase of the proportion of people in the PRS and the recent cuts to Local Government budgets, mean that the professionals who are tasked with protecting the wellbeing of tenants are struggling to keep up with the rise in poorer housing conditions associated with the private rented sector.

⁷ Figures rounded up to nearest 100, Q3 2010 to Q3 2016, DCLG Live Table 775 (England), last accessed in February 2017.

⁸ [English Housing Survey: Headline Report 2014-15, DCLG, 2016](#)

⁹ [English Housing Survey: Headline Report 2014-15, DCLG, 2016](#)

¹⁰ Ibid.

The lack of security for tenants in rented accommodation also makes them vulnerable to retaliatory evictions. One of our members said: *"There a countless examples I could cite of evictions following tenants making reasonable complaints about disrepair to their landlords."* Whilst only a minority of landlords are behaving irresponsibly, the tenants that are unlucky enough to be renting from these landlords, require a level of protection when things go wrong.

The law changed in 2015 to ensure that tenants cannot be evicted by their landlord for no reason if they complain about the conditions in their home and an improvement order is issued by the Council after an inspection. However, this protection only lasts for only 6 months and is only applied to tenancies, which started after October 2015.¹¹ It is therefore likely that many tenants still fear for the future security of their home despite the new legislation and may be reluctant to raise poor housing conditions with a Local Authority as a result. Rising market rents in other properties as well as the costs of moving home can be further barriers to better housing conditions for tenants.¹² Better protection and conditions for tenants would enable the quality of housing stock in the PRS to be improved as tenants would have more confidence to complain to Local Authorities about poor housing conditions.

Housing Health and Safety Rating System

The Housing Health and Safety Rating System (HHSRS) is a method of assessing housing conditions. It employs a risk assessment approach to enable risks from hazards to health and safety in dwellings to be minimised. The system applies to all dwellings, regardless of ownership.

EHPs working in Local Authorities use this system to raise standards in the PRS by requiring owners to take action as necessary to remove or minimise hazards in their properties. Hazards are usually related to fire safety, excess cold as well as to mould and damp. Whilst the percentage of non-decent homes in the private rented sector has gone down between 2006 and 2014, the number of non-decent homes has remained roughly the same in this time. This is thought to be the case due to new housing being built, which is in good repair, whilst old housing stock has not been significantly improved. 1.3 million people in the private rented sector in England still live in non-decent housing.¹³

HHSRS has been in place for almost 14 years, having been introduced as part of the 2004 Housing Act. A review was promised after the first five years of operation of the system but this never happened. It is now vital that HHSRS is formally evaluated and appropriately brought up to date or amended as necessary. The recent moves to introduce minimum energy efficiency standards¹⁴ makes an update of HHSRS particularly timely.

Furthermore, good quality information on the HHSRS aimed at the general public would also be an important step forward in helping to raise awareness of what poor housing conditions are dangerous to health and when it is appropriate to seek help. We would like to see the HHSRS and the enforcement guidance updated by DCLG and the new system to be publicised to the public.

¹¹ [Retaliatory Eviction and the Deregulation Act 2015 guidance note](#), DCLG, Oct 2015.

¹² Summary: Poor Homes, poor health – to heat or to eat?, Pro-Housing Alliance, Oct 2012.

¹³ Annex table AT2.2 Non-decent homes by tenure, English Housing Survey Headline Report 2014-15 Section 2: Tables, Figures and Annex Tables, DCLG, 2016.

¹⁴ <https://www.rla.org.uk/landlord/guides/minimum-energy-efficiency-standards.shtml>

Case studies

The three case studies below illustrate the state of housing in three areas in England to highlight some of the issues facing Housing Managers in those wards. We would be happy to put the Public Accounts Committee in touch with Housing Officers in these 3 areas, if further information would be of interest to the State of the Nation inquiry.

North Devon case study

The population of North Devon has grown by 22 per cent over the last 30 years – an increase of around 17,000 people. The expansion of the household population is likely to continue in the long term.

Research suggests that the number of people aged 65 and over will grow by over 50 per cent by 2031 in North Devon, with a doubling of those aged 85 and over. There is a range of implications for housing as a result. For example, older people are more likely to live in an under-occupied home, are less likely to move and have higher levels of outright home ownership than those of working age. However, older people also have a reduced ability to maintain and repair homes either because of mobility or low incomes.

Those on the lowest incomes are accommodated in properties with the poorest conditions since these are cheaper to rent. Heating systems are a key factor in housing conditions and one which has direct link to the health of residents. There are over 2,000 dwellings within North Devon that lack central heating – equating to 5 per cent of all dwellings. This figure represents a significant population at risk to health and safety arising from cold hazards. Whilst, the number of dwellings in North Devon lacking central heating has halved between 2001 and 2011, it must be noted that in 22 of the 27 wards the percentage of dwellings lacking central heating is significantly higher than the national average.

North Devon also has a higher proportion of older pre-1919 dwellings than is the case nationally. These properties are invariably in a poorer state of repair, have higher repair costs than more recently constructed dwellings and are more likely to have category 1 hazards, and hence a greater incidence of non-decency. These properties form the predominant property type in the North Devon private rented sector and accommodate a high proportion of the vulnerable households seeking accommodation in the sector. The social housing stock is most energy efficient whereas the least energy efficient homes are in the private rented sector.

Thurrock case study

Thurrock is located on the outskirts of Greater London and therefore is closely linked to the housing issues affecting the capital. It is predicted that between 2014 and 2037 the population of Thurrock will increase by 23.1 per cent, resulting in around 18,586 new households living in the area.

Annual net migration from Greater London to Thurrock is estimated to be around 1,619 people per year. This adds extra pressure on the housing demand in the area, and puts pressure on the local population, whose gross earnings are on average 32 per cent lower than those in inner London.

Between May 2015 and May 2016, house prices rose by 12.5 per cent in the area - a surge of nearly £28,000 in one year for the average property. Thurrock also experienced an increase in rental prices. In May 2013 the average rent for a one bedroom property was £132 and has progressively increased to £161 by May 2016.

Based on average incomes of households in the area, it is estimated that around 45 per cent of households are unable to afford market rent levels. 56 per cent cannot afford to buy their own home.

Rising unaffordability of housing relative to average incomes has created a number of unintended consequences. This includes overcrowding, burgeoning number of homes in multiple occupation, an increasing number of complaints among tenants against their landlords and a growing number of tenants living in sub-standard properties. The main hazards that EHOs discover in poor quality accommodation are damp and mould, as well as excessive cold in the home. This increases the pressures faced by Housing departments within Local Authorities and Councils at a time when budgets have been severely cut.

Manchester case study

The proportion of dwellings in Greater Manchester that are in the private rented sector is very similar to the national and regional averages but there are significant variations within the sub-region. Each of the districts adjoining Greater Manchester has a lower proportion in this tenure than England and only Calderdale exceeds the Greater Manchester average.

There is a clear spatial pattern to the areas with high proportions of private rented housing, with them virtually all being in and around the city centre, extending southwards to Didsbury. 65 per cent of housing in the City Centre ward is being privately rented, and 28 per cent of households in Manchester as a whole are living in private rented accommodation. The North West region has seen the lowest inflation in private rents since January 2005, although significant differences exist across the region. Overall, rental increases have been relatively modest, with the national average almost exactly at the Bank of England target inflation rate and the North West just over half that rate.

Affordability has worsened quite considerably everywhere between 2013 and 2015. Greater Manchester's lower quartile affordability ratio is greater than the metropolitan counties with a ratio of 5.54 apart from the West Midlands with a ratio of 6.08 in 2015. Levels of overcrowding and concealed families have worsened between the last two censuses and the highest concentrations are in Manchester, Oldham and Rochdale.